

Re: FAA Docket 17005
Date: 10/17/2005

To whom it may concern -

Thank you for this opportunity to comment on FAA Docket 17005, the Notice of Proposed Rule Making (NPRM) that proposes to make our present temporary Air Defense Identification Zone (ADIZ) around Washington DC permanent.

I oppose this proposed action.

I am an Instrument Rated Private Pilot based out of College Park Airport (CGS). I have been flying from College Park for over thirty years, ie since 1975, when I received my license after training at Suburban Airport (W18) in Laurel Maryland. I have over 1,400 hours of flight time in single and twin engine aircraft. I typically fly 60-75 hours per year for a mix of business and personal transportation. I own a third of an airplane in partnership with two other pilot/owners. I regularly fly in and out of many FRZ (Flight Restricted Zone) and ADIZ covered airports such as College Park (CGS) in College Park MD, Lee Airport (ANP) in Annapolis MD, Freeway Airport (W00) in Bowie MD, Bay Bridge Airport (W29) on Kent Island, MD, and Tipton Airport (FME) in Fort Meade MD.

My flying within the ADIZ, since it was imposed as a "temporary" measure in February 2003, has encountered a number of problems:

- (1) Long wait times to file a flight plan
- (2) Long wait times to pick up a clearance and squawk code prior to departure
- (3) Several ADIZ reentry denials due to traffic saturation on the part of Air Traffic Control or "lost" flight plans - some requiring an unscheduled landing at another airport to phone in and resolve
- (4) When performing training - for currency or for further certificates/ratings I have had to fly outside the ADIZ - an expensive addition to the training costs

My local avionics shop (which repairs aviation radios and sells/installs new instruments and radios) and Fixed Base Operator (who provides mechanical services for repair and FAA required annual inspections), previously located at College Park Airport have relocated to Easton Airport in Easton MD and will never return, partly due to the restricted flying permitted by the ADIZ. This, of course, requires that I fly to Easton (or elsewhere) to have these services performed - at great cost in dollars and time to me.

How is this NPRM addressing the economic impacts of such airport related businesses?

One of my partners is giving up flying completely and selling his share in the airplane. He cites the excessive restrictions and potentially onerous penalties for accidental errors of flying as Pilot In Command (PIC) in the ADIZ. He had been happy to fly out of Annapolis MD, under the Enhanced Class B airspace, after 9/11 when the ADIZ still did not exist.

Due to the ADIZ, I find the routings assigned to my flights under either Instrument Flight Rules or under Visual Flight Rules are not often the most economically direct routes. These extra miles I must fly add significantly to the cost of my flying in dollars for fuel and in time.

I request that the Federal Aviation Administration (FAA) hold public hearings on this proposed permanent ADIZ to adequately hear from those who are impacted. I

follow flying issues in the Washington area with intense interest; however I have yet to see a balanced analysis of the economic and operational impacts on aviation businesses and pilot/operators. Where is the analysis of alternatives to the ADIZ?

I recognize that Washington DC contains certain unique assets that warrant protective measures. The "inner circle" 15-mile Flight Restricted Zone (FRZ) has a number of protective systems in place to guard the DC assets. The light aircraft that I operate, which fly at slow airspeeds and carry limited weight, pose little if any threat to such assets. I request that you please change the current and proposed ADIZ to exclude light aircraft from the onerous requirements to file a flight plan for entry and exit, obtain a unique transponder code and maintain two-way communication with Air Traffic Control. Pilots are now well trained to follow the entry and exit protocols and profiles that do not trigger protective responses.

I find it ironic that my mother, a US Navy officer, learned to fly Piper Cubs in the Washington area during WWII while stationed at Nebraska Avenue, the current digs of Homeland Security.

The transponder codes available at a given time are almost totally consumed during a large "push" (aviation version of "rush hour") of aircraft traffic at the Washington area's Potomac consolidated TRACON (terminal control). The workload of performing the Air Traffic Control side of these light aircraft ADIZ requirements increases the staffing requirements for the FAA (and the cost to the citizens). During these traffic peaks the system falls apart with resultant long delays to the customers (aircraft operators) and stressful hours for the controllers. Frequencies are congested and communications difficult. Under these circumstances safety is not enhanced.

Please note that within the ADIZ, Air Traffic Control is providing no services to the ADIZ departure and reentry aircraft. There is no positive separation of traffic or warnings of nearby traffic or radar flight following or terrain warnings. The ADIZ does not mandate these services and the controllers are far too busy to provide them.

When I talk with pilots from airports outside the Washington area, they all share the same fear of flying within or near the current ADIZ. They understand the intimidating and complex rules of flying in this airspace and would want to fly into this area for pleasure or business. However they value their flying privileges highly and do not want to take a chance of losing them due to an inadvertent error. One airline pilot I know dreads flying in the ADIZ due to the ever changing rules (and interpretations) and the impact any potential certificate action would have on his career and ability to put food on the table of his family.

I certainly miss the "good old days" of five years ago when I could spontaneously decide the day was right for a scenic flight over the Washington region to provide sight seeing adventure for a neighbor or friend. The area is spectacular in the autumn with the trees turning their fall colors. Now such flights are "scheduled" well ahead of time and involve significantly more phone calls and paperwork. Ahh, the freedoms lost.

As you are well aware, no light aircraft from the general aviation fleet has ever been used in a terrorist attack. None of the violations of the Washington ADIZ has been determined to be terrorist related. The distinction of potential threat versus demonstrated threat/risk has not been considered in this NPRM.

Please work with industry groups such as the Aircraft Owners and Pilots Association to design and implement a workable system for aircraft operations near Washington DC.

Thank you very much for allowing me to voice my opinion in this matter. A true and free democracy listens to its citizens; and respects and acts on their concerns.

Respectfully submitted,

Stacey Widdicombe
Voter from Laurel, MD